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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Mike Sammons
Plaintiff

vs.

2:14-cv-00574-GMN-VCF

Rino International Corporation
Defendant

COMPLAINT

Plaintiff **Mike Sammons** files this Complaint against **Rino International Corporation** and alleges as follows:

THE PARTIES

1. Plaintiff Mike Sammons is a resident and citizen of the State of Texas. Plaintiff and his wife have equal ownership of over 1,000,000 shares of Defendant Rino International Corporation ("Rino").
2. Defendant Rino is a defunct corporation which was incorporated in the State of Nevada on September 26, 2006, prior to its charter being revoked by the Nevada Secretary of State on or about October 8, 2011. Rino has no stock transfer agent and no corporate registered

agent¹, and has no operations, officers, assets, or employees in the USA. The sole assets of Rino are ownership interests in foreign companies.

JURISDICTION AND VENUE

3. Jurisdiction of this Court exists pursuant to 28 USC §1332, §1441 and §1446, where complete diversity of citizenship exists, and the amount in controversy is in excess of \$75,000.² Venue and the relief sought is authorized pursuant to NRS 78.175(5) and NRS 78.605.

GENERAL ALLEGATIONS

4. Rino was incorporated in the State of Nevada on September 26, 2006.
5. Rino's corporate charter was revoked by the Nevada Secretary of State on or about October 8, 2011.
6. Rino has no registered agent, and has no operations, officers, assets, or employees in the USA. The sole assets of Rino are ownership interests in foreign companies.
7. The last filing with the Nevada Secretary of State by Rino identified Dejun Zou as the sole officer and director.³

¹ The registered agent for Rino in Nevada resigned on May 22, 2013.

² Based upon the last public trade for Rino common stock, the "fair market value" of the foreign assets of Rino exceed \$500,000.


³ There were two filing addresses for Mr. Zou with the Secretary of State: (a) 11 Youquan Road, Zhanqian St., Jinzhou District, Dalian, China 116100, and (b) 30211 Banderas, Suite 200, Rancho Santa Margarita, CA 92688.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mike Sammons prays for relief against the Defendant as follows:

1. Appointment of Michael Sammons as receiver for Rino International Corporation for the purpose of liquidating any assets, net of obligations, and distributing same to shareholders;
2. Costs and further relief in the Plaintiffs' favor as this Court deems just and proper.

Respectfully submitted:

 4/10/14

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